

**Region 3 GPRA Baseline RCRA Corrective Action Facility**

**Milford Investment Properties, LLC –  
KLI Site.** (Formerly: KLI Inc.; Keller Ladders, Inc.; Keller Aluminum)

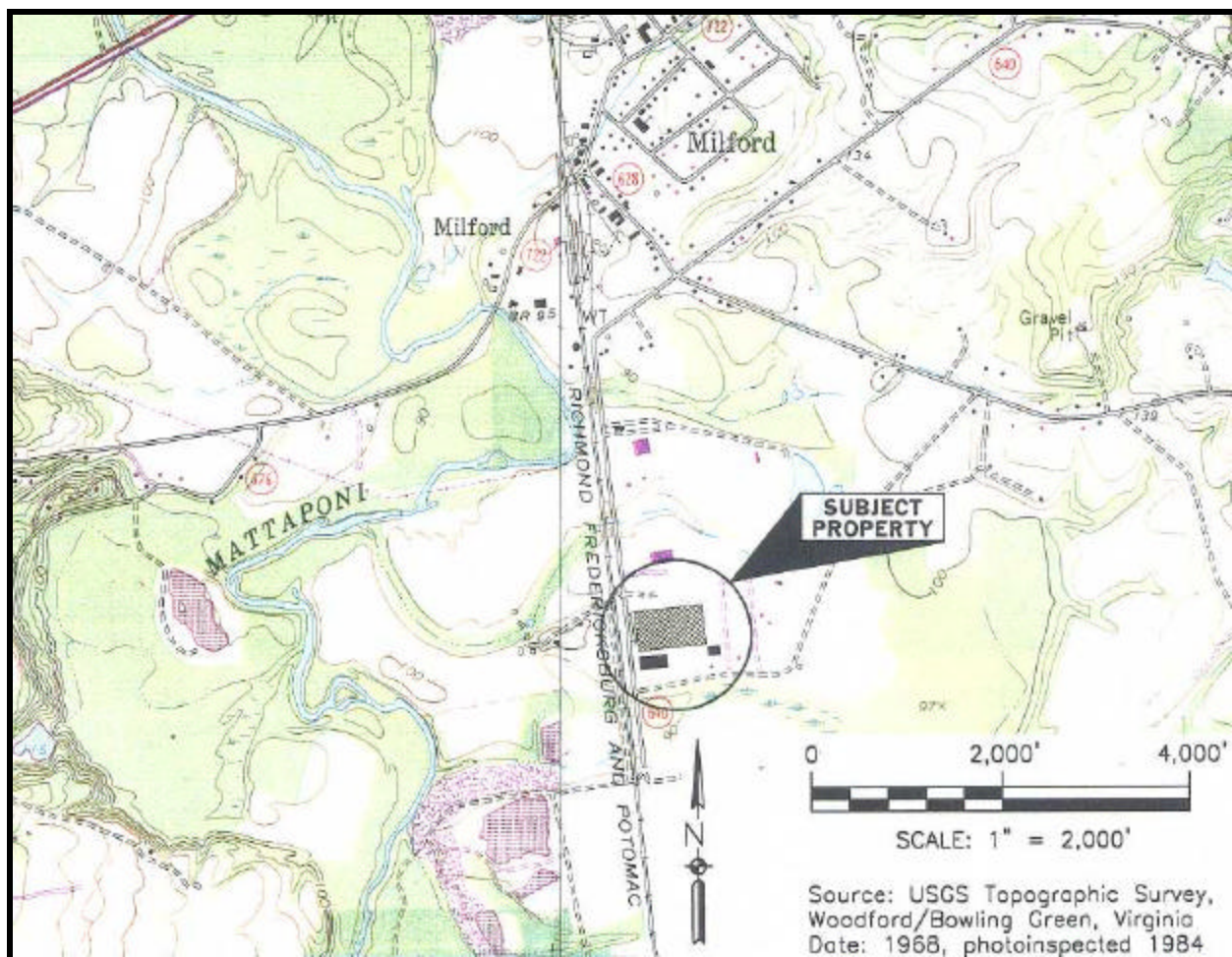
16174 Industrial Drive

Milford, VA 22514

Congressional District 1

EPA ID #: VAD052356623

Last Updated: January 4, 2008



## **Current RCRA CA Activities**

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The Virginia Department of Environmental Quality (DEQ) is the lead agency for oversight of RCRA Corrective Action (CA) work at the facility. The CA investigations and any necessary clean up activities at the facility are being implemented in accordance with the conditions and requirements of a Post-Closure Care Permit (Permit) issued to the facility.

A Post-Closure Care Permit was initially issued on September 19, 1997, for a hazardous waste surface impoundment with wastes closed in place. The above Permit was the subject of an appeal by the facility. However, in November 2004, the appeal was withdrawn.

The facility submitted a new Post-Closure Care Permit application in May 2005, which included CA requirements of the Hazardous and Solid Waste Amendments (HSWA) of the Resource Conservation and Recovery Act (RCRA) of 1984. The permit application was reviewed and deemed administratively and technically complete by the DEQ by letter, dated August 22, 2005.

On May 27, 2006, the DEQ revoked the old Post-Closure Care Permit and reissued a new Post-Closure Care Permit with the HSWA CA Module and CA Attachments. Groundwater is being monitored semiannually and the results are submitted to the DEQ pursuant to the current Permit.

As part of CA requirements, the facility submitted a Phase I RCRA Facility Investigation Work Plan (RFI Work Plan) to the DEQ for review on August 21, 2006. The DEQ completed its review of the RFI Work Plan and sent a notice of deficiency (NOD) to the facility on December 21, 2006.

The facility submitted a revised RFI Work Plan and Response to Comments on March 8, 2007. The DEQ completed its review of this material and sent a second NOD to the facility on May 2, 2007. On June 4, 2007 the facility submitted a response to the second NOD, along with replacement pages for the revised RFI Work Plan.

The DEQ approved the facility's revised RFI Work Plan, dated March 7, 2007, as revised June 4, 2007, by DEQ letter, dated June 26, 2007.

In addition to the ongoing Corrective Action activities, a Class 1 Modification was submitted to the DEQ for review on December 13, 2006, requesting the transfer of the Permit and ownership of the facility from KLI, Inc. to Milford Investment Properties, LLC. The DEQ approved the Class 1 permit modification on January 18, 2007, and revised the Post-Closure Care Permit to reflect Milford Investment Properties, LLC as the new owner. The facility will continue to be referred to as the KLI Site.

## **Site Description**

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The facility is located south of the town of Milford in Caroline County, Virginia. The facility site consists of a 21.33-acre parcel bounded by Industrial Drive (Route 640) to the west, Route 773 to the south, Hoover Wood Products to the east, and Jones Chemical to the south.

During approximately 1968 to 1988, the following three businesses were operated at the facility: Keller Extrusions of Virginia, Inc., Keller Building Products of Virginia, Inc., and Keller Ladders of Virginia. Management of wastewater prior to the construction of a surface impoundment in 1977 is unclear. The property contains a drainage ditch located next to the surface impoundment and parallel to Route 773. The drainage ditch contains two drains that are constructed below Route 773, which discharge into neighboring wetlands.

## **RCRA CA Milestones**

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To date the following RCRA CA milestones have been completed at this facility:

- EPA Region III completed a RCRA Facility Assessment (RFA) in January 1989.
- On October 23, 2001, KLI, Inc. submitted an independent investigation report on the entire site to EPA Region III. The report recommends the following actions:
  - Remove and dispose of sludge from an outdoor sump (SWMU No. 8).
  - Remove and dispose of wastewater and sludge from two concrete holding tanks (SWMU No. 11).
  - Complete a site-wide risk assessment to determine whether site-wide closure can be obtained.

On December 4, 2001, EPA and DEQ met with Keller representatives to assess the work done by Keller's consultant, discuss information needed to complete the environmental indicators, and discuss process options to obtain the information.

Effective March 7, 2003, the lead authority for RCRA Corrective Action at the facility was transferred from the EPA Region III to the DEQ. Representatives of the DEQ and KLI, Inc. met on May 20, 2003, to discuss the change in CA lead agency and necessary actions for continued progress of RCRA CA work at the facility.

The DEQ revoked the 1997 Post-Closure Care Permit and reissued a new Post-Closure Care Permit with the RCRA CA Module and Attachments on May 27, 2006. As part of the first phase in the Corrective Action process the facility submitted to the DEQ for review an RFI Work Plan in August 2006.

The DEQ approved the facility's revised RFI Work Plan, dated March 7, 2007, as revised June 4,

2007, by DEQ letter, dated June 26, 2007.

## Environmental Indicator Status

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Under the Government Performance and Results Act (GPRA), EPA has set national goals to address high priority RCRA Corrective Action facilities by the year 2008. EPA is evaluating two key Environmental Indicators (EIs) for each facility: Current Human Exposures Under Control and Migration of Contaminated Groundwater Under Control. This facility is one of EPA Region III's high priority facilities and falls under the GPRA initiative.

The DEQ's current evaluation of Environmental Indicators for this facility is as follows:

- *Current Human Exposures Under Control Determination:* The DEQ has made the EI determination of "yes, current human exposures are under control." The above determination is based upon the DEQ's Current Human Health Environmental Indicator (HHEI) Determination Report, CA725, dated September 29, 2003. This above HHEI determination is considered current, effective January 4, 2008.
- *Migration of Contaminated Groundwater Under Control Determination:* The DEQ has made the EI determination of "yes, migration of contaminated groundwater is under control," based upon the review of CA information for the KLI site contained in the EI determination Report, CA750, dated September 25, 2003. The above EI determination indicates that the migration of "contaminated" groundwater is believed to be under control, and that monitoring will be conducted to confirm that contaminated groundwater remains within the "existing area of contaminated groundwater." This EI determination is considered current, effective January 4, 2008.

## Contaminants

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The primary contaminants in the groundwater and soils at the facility are chromium and low levels of chlorinated organics.

## Institutional Controls

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A Post-Closure Care Permit with the RCRA CA Module and Attachments was issued by the DEQ for the facility site on May 27, 2006. The above Permit requires post-closure care and groundwater monitoring, and site-wide CA.

A Deed Notice is in place identifying the location of the hazardous waste surface impoundment closed

with waste in place as a landfill.

## Community Involvement

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Citizens' questions and concerns may be directed to the contacts below. Also, the Administrative Record which contains all documents and information regarding the RCRA CA program for this facility is available for public review at the following location:

Virginia Department of Environmental Quality  
629 East Main Street  
Richmond, Virginia 23219  
Phone: (804) 698-4131  
Contact: Trisha Johnson

The DEQ also maintains a facility mailing list that is used to inform the public of substantial issues and Permit administrative actions regarding the facility.

## Government Contacts

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The Commonwealth of Virginia DEQ is the lead CA authority for this project. Please contact the DEQ project manager listed below for details on this project or the contents of this fact sheet.

### **DEQ Project Manager**

Trisha Johnson  
Virginia Department of Environmental Quality  
629 East Main Street  
P.O. Box 1105  
Richmond, VA 23218  
Phone: (804) 698-4131  
Email: [tbjohnson@deq.virginia.gov](mailto:tbjohnson@deq.virginia.gov)

### **EPA Project Manager**

Diane Schott - 3WC23  
U.S. Environmental Protection Agency - Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029  
Phone: (215) 814-3430  
Email: [schott.diane@epa.gov](mailto:schott.diane@epa.gov)

For more information about EPA's corrective action program, including Environmental Indicators, please visit EPA's web site at: [www.epa.gov/reg3wcmd/correctiveaction.htm](http://www.epa.gov/reg3wcmd/correctiveaction.htm)

## Facility Contact

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The facility contact is:

Mr. Garry L. Gray  
Milford Investment Properties, LLC  
16440 Industrial Drive  
Milford, VA 22514  
Phone: 804-633-6800  
Email: [ggray@bealenet.com](mailto:ggray@bealenet.com)

## Fact Sheet Updates

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The previous Fact Sheet was updated July 6, 2007. The next update is scheduled for July 2008. Previous Fact Sheets may be obtained through the DEQ contact.